

EXHIBIT 3

In the Matter of:

FTC v. Jason Cardiff, et al.

March 28, 2019

Eunjung Cardiff

Condensed Transcript with Word Index



For The Record, Inc.

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 CENTRAL DISTRICT OF CALIFORNIA</p> <p>3</p> <p>4 FEDERAL TRADE COMMISSION,)</p> <p>5 Plaintiff,)</p> <p>6 vs.) No. CV18-2104-JGB(KKx)</p> <p>7 JASON CARDIFF,)</p> <p>8 individually and as an)</p> <p>9 owner, officer, director,)</p> <p>10 or member of REDWOOD)</p> <p>11 SCIENTIFIC TECHNOLOGIES,)</p> <p>12 INC., a California</p> <p>13 corporation, et al.,</p> <p>14 Defendants.</p> <p>15</p> <p>16 VIDEOTAPED DEPOSITION OF EUNJUNG</p> <p>17 CARDIFF, taken on behalf of the</p> <p>18 Plaintiff, at 300 North Los</p> <p>19 Angeles Street, 7th Floor, Los</p> <p>20 Angeles California, commencing at</p> <p>21 9:30 A.M. on March 28, 2019, 2019</p> <p>22 before PATRICIA L. HUBBARD,</p> <p>23 CSR #3400, a Certified Shorthand</p> <p>24 Reporter in and for the State of</p> <p>25 California, pursuant to Notice.</p>	<p>3</p> <p>1 I N D E X</p> <p>2</p> <p>3 WITNESS PAGE</p> <p>4 EUNJUNG CARDIFF</p> <p>5 (By Mr. Rodriguez) 9</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 E X H I B I T S</p> <p>11 PAGE</p> <p>12 PLAINTIFF'S DESCRIPTION REFERENCED</p> <p>13 Exhibit 1 Bank of the West 30</p> <p>14 Ultimate Beneficial Ownership</p> <p>15 and Senior Managing Official</p> <p>16 Certification Form</p> <p>17 Exhibit 2 TD Canada Trust Bank Statement 32</p> <p>18 Exhibit 3 Directors Resolution dated 34</p> <p>19 October 1, 2015</p> <p>20 Exhibit 4 Novelty Express New Item Form 48</p> <p>21 Exhibit 5 Cloverstrip Order Form 52</p> <p>22 Dated 8/13/18</p> <p>23 Exhibit 6 Cloverstrip CBD Oral Thin 55</p> <p>24 Film Strips ad</p> <p>25</p>
<p>2</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2 For the Plaintiff:</p> <p>3 FEDERAL TRADE COMMISSION</p> <p>4 BY: EDWIN RODRIGUEZ, ESQ.</p> <p>5 ELIZABETH JONES SANGER, ESQ.</p> <p>6 600 Pennsylvania Avenue, NW</p> <p>7 Washington, DC 20580</p> <p>8 202.326.3147</p> <p>9 erodriguez@ftc.gov</p> <p>10 esanger@ftc.gov</p> <p>11</p> <p>12 APPEARANCES OF COUNSEL: (Continued)</p> <p>13 For the Defendants:</p> <p>14 JAMES D. WHITE, ESQ.</p> <p>15 303 Broadway Street</p> <p>16 Suite 1044</p> <p>17 Laguna Beach, California 92651</p> <p>18 949.697.9236</p> <p>19 jdw@jamesdwhitelaw.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Also Present:</p> <p>24 Connor Sands (Present via telephone)</p> <p>25 Matt Hausle, Videographer</p>	<p>4</p> <p>1 E X H I B I T S (Continued)</p> <p>2 PAGE</p> <p>3 PLAINTIFF'S DESCRIPTION REFERENCED</p> <p>4 Exhibit 7 Cloverstrip Cannabis CBD Strips 66</p> <p>5 Packaging</p> <p>6 Exhibit 8 Invoice from Aavishkar to 70</p> <p>7 Redwood</p> <p>8 Exhibit 9 FCCd Logistics, Inc. Invoice 72</p> <p>9 To Advanced Mens Institute</p> <p>10 Exhibit 10 Letter from Cloverstrip to 74</p> <p>11 Dear Valued Retail Partner</p> <p>12 Exhibit 11 Cloverstrip Cannabis CBD 78</p> <p>13 Pharmastrip Thin Film</p> <p>14 Technologies brochure</p> <p>15 Exhibit 12 Merchant Processing 83</p> <p>16 Application and Agreement</p> <p>17 Exhibit 13 Continuing Personal Guaranty 86</p> <p>18 Provision - Personal</p> <p>19 Guarantor</p> <p>20 Exhibit 14 Cannabis Oral Thin Film 92</p> <p>21 Technology brochure</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">6</p> <p>1 E X H I B I T S (Continued)</p> <p>2 PAGE</p> <p>3 PLAINTIFF'S DESCRIPTION REFERENCED</p> <p>4 Exhibit 23 Preliminary Injunction with 149</p> <p>5 Asset Freeze, Receiver, and</p> <p>6 Other Equitable Relief Against</p> <p>7 Jason Cardiff and Eunjung</p> <p>8 Cardiff</p> <p>9</p> <p>10</p> <p>11</p> <p>12 INFORMATION REQUESTED:</p> <p>13 (NONE)</p> <p>14</p> <p>15</p> <p>16 WITNESS INSTRUCTED NOT TO ANSWER:</p> <p>17 Page 134, Line 4</p> <p>18 Page 138, Line 11</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">8</p> <p>1 VIDEOTAPE OPERATOR: Will the court</p> <p>2 reporter please swear in the witness.</p> <p>3</p> <p>4 EUNJUNG CARDIFF,</p> <p>5 called as a witness, having been</p> <p>6 sworn, was examined and testified</p> <p>7 as follows:</p> <p>8</p> <p>9 EXAMINATION</p> <p>10 BY MR. RODRIGUEZ:</p> <p>11 Q. Miss Cardiff, my name is Edwin</p> <p>12 Rodriguez. I'm representing the Federal Trade</p> <p>13 Commission.</p> <p>14 And I'll be taking your deposition</p> <p>15 today.</p> <p>16 Have you ever been deposed before?</p> <p>17 A. I don't believe so. I was interviewed</p> <p>18 in a judgment debtor's exam, so I don't know if</p> <p>19 that's a deposition.</p> <p>20 Q. Was it sworn testimony?</p> <p>21 A. I believe so.</p> <p>22 Q. In the deposition I will ask you</p> <p>23 questions, and my questions and your answers will be</p> <p>24 recorded by the court reporter at the end of the</p> <p>25 table.</p>

9

1 And you understand that you need to
2 speak up to answer orally in giving your answers so
3 that the court reporter can hear you clearly.

4 He -- she won't be able to record a nod
5 or a shake of the head.

6 Do you understand?

7 A. Yes.

8 Q. If you don't understand my questions for
9 any reason, please let me know.

10 I also want you to understand if you
11 need to take a break at any time or for any reason,
12 you should tell me or your attorney, and we will
13 finish your answer if we are in the middle of one,
14 and then see what we can do about a break.

15 Is that okay?

16 A. Okay.

17 Q. If you want to talk to your attorney,
18 that's -- I ask that you finish your answer if we're
19 in the middle of one, middle of an answer an answer,
20 and then you can talk to your attorney.

21 Sometimes you'll give an answer as
22 completely as you can, but then later on you might
23 remember additional information in response to an
24 earlier question or perhaps some clarification. And
25 if that happens, please tell us and if you'd like to

10

1 revise an earlier answer, and we can do that on the
2 record.

3 Is that okay?

4 A. Okay.

5 Q. And sometimes when you're answering you
6 may think of documents that may help you remember
7 the answer or may help you give a more accurate one.
8 And if you do, please let us know, and we may have
9 those documents with us or we may be able to get
10 them to help you answer completely and accurately.

11 Are you taking any medication or drugs
12 of any kind or do you suffer from any illness which
13 might make it difficult for you to understand and
14 answer my questions today?

15 A. Not at this time.

16 Q. From time to time your attorney may
17 object to the questions that I ask you. And you
18 should answer the question unless he directs you not
19 to answer.

20 Do you understand?

21 A. Yes.

22 Q. Now, it is our understanding from
23 conversation with your attorney that you may be
24 asserting your Fifth Amendment privilege against
25 self-incrimination today and that based on your

11

1 assertion of that privilege, your attorney may
2 direct you not to answer questions.

3 So, throughout the deposition today we'd
4 like to enter into a stipulation with your attorney
5 that if you answer -- you assert your Fifth
6 Amendment privilege by saying, for example, "I
7 assert my Fifth Amendment privilege" or "the Fifth"
8 or "I plead the Fifth" or similar words, that it
9 will be our understanding that you are choosing not
10 to answer the question posed.

11 MR. WHITE: You're proposing a
12 stipulation. Please do so to me, sir.

13 MR. RODRIGUEZ: Okay. Do you agree to
14 that stipulation?

15 MR. WHITE: I do.

16 MR. RODRIGUEZ: Thank you.

17 MR. WHITE: So long as you do.

18 MR. RODRIGUEZ: Yes.

19 MR. WHITE: And that Ms. Sanger does.

20 MS. SANGER: Yes.

21 MR. WHITE: Thank you.

22 BY MR. RODRIGUEZ:

23 Q. But we did want to advise you that if
24 you refuse to answer questions after asserting your
25 Fifth Amendment privilege, we may ask the Court do

12

1 make negative or adverse inferences from your
2 refusal to respond and we may ask the Court to
3 foreclose you from presenting evidence in this case
4 if you refuse to answer questions that seek that
5 information.

6 Do you understand?

7 A. Yes.

8 Q. Miss Cardiff, can you please state your
9 full name for the record?

10 A. Eunjung Cardiff.

11 Q. And where do you reside?

12 A. Can we --

13 MR. WHITE: Yes. I think we might as
14 well begin the process of the Fifth Amendment.

15 MR. RODRIGUEZ: Okay.

16 MR. WHITE: We are going to assert the
17 Fifth Amendment privilege probably to everything you
18 ask.

19 MR. RODRIGUEZ: Okay.

20 MR. WHITE: I'd like to take a minute to
21 make a record of several conversations very briefly.
22 I won't belabor the matter.

23 MR. RODRIGUEZ: Okay.

24 MR. WHITE: But very briefly. And then
25 ask for some further input from you two, because

<p style="text-align: right;">13</p> <p>1 when we last spoke there seemed to be some 2 inclination on, as I understood, Ms. Sanger's 3 comments to me that perhaps your questioning today 4 might be geared so that a Fifth Amendment privilege 5 would not be assertable. 6 At least that was my understanding of 7 our laughs conversation. 8 So if you would allow me, I'd like to 9 take maybe a minute or two to make a record. 10 MR. RODRIGUEZ: Okay. 11 MR. WHITE: All right. Thank you for 12 offering the stipulation that any reference to the 13 Fifth or privilege we can short circuit and simply 14 proceed rapidly through that. 15 As I said, I do believe we will probably 16 be asserting the Fifth to just about everything 17 unless we can carve out some areas for which the 18 Fifth might not be applicable or for which we might 19 enter into some sort of arrangement stipulation so 20 that we can make some progress without having today 21 be unproductive. 22 The question of asserting the Fifth 23 first came to the frontal lobes of my mind a few 24 days ago. And it arose as a result of a telephone 25 conversation that, frankly, I don't know,</p>	<p style="text-align: right;">15</p> <p>1 and Ms. Sanger and I were on and I think Mr. Prunty 2 was on -- you may remember better than I, 3 Ms. Sanger -- but the issue again came up because 4 Mr. Fletcher in the course of that conversation, I 5 think it was one of our meet and confers, said 6 somewhat out of the blue and primarily directed his 7 comment to you, Ms. Sanger, as I understood the ebb 8 and flow of the conversation, he seemed to be 9 saying, "Liz, I want you to know that Mr. White 10 asked me about the C-word." That was his phrasing, 11 "the C-word." He didn't use the word "criminal." 12 It was just sort of code, the C-word. 13 And then Mr. Fletcher went on to report 14 to you that he hadn't been non-responsive and he 15 reiterated that he wanted you, Ms. Sanger, to know 16 Of that conversation. 17 And I felt that was rather odd at the 18 time. And in thinking about it after our call and 19 in reviewing your deposition notice and in reviewing 20 the FTC's website and the structure of what's 21 revealed on your website, it began to occur to me 22 that there was some coded message being passed from 23 Mr. Fletcher to you, Ms. Sanger, at least I took it 24 that way. 25 And I think I made a reference in a</p>
<p style="text-align: right;">14</p> <p>1 Mr. Rodriguez, whether you were on or not, but I 2 know Ms. Sanger was on, and I'm not 100 percent sure 3 which phone call it was, because we had several over 4 the course of the last couple weeks. But the 5 essence of that particular call and which was the 6 genesis of my view that the Fifth is something I 7 wanted to consider very carefully is that I have had 8 a conversation with Michael Fletcher, one of the 9 attorneys for the Franzell firm representing the 10 receiver. 11 And in that conversation he and I, I 12 think, had talked a little bit earlier, but not in 13 any great length, and I posed the question to him as 14 to why this case had resulted in a hold or 15 requirement for them to turn in their passports. 16 And I phrased the question something like, you know, 17 this is a criminal -- this is a civil case, isn't 18 it? This isn't a criminal case? I phrased it as a 19 question. 20 Mr. Fletcher's response seemed odd at 21 the time. He basically deflected the question. He 22 didn't really answer it. 23 But I didn't concern myself terribly 24 with it. 25 But then on the next call that he was on</p>	<p style="text-align: right;">16</p> <p>1 subsequent conversation to this pas de deux, which I 2 thought was rather change, a two-person dance. 3 Okay? 4 And as I reflected on it more and 5 discussed the matter with my clients, and as I 6 reflected on what I was learning about some of the 7 history of the case, I began to become even more 8 concerned. 9 As I'm quite sure I've told you both, 10 I'm a business litigation civil attorney. I'm not a 11 criminal attorney. 12 So, at one point in another one of our 13 many telephone conversations I requested of 14 Ms. Sanger to postpone these depositions today for perhaps 15 30 days so that I could engage with criminal counsel 16 to give my clients a better understanding of what 17 may be at play here. 18 Ms. Sanger declined that request and, 19 thus, we're here today. 20 But I did say to you and Mr. Prunty, to 21 Ms. Sanger and Mr. Prunty, I think you may have been 22 on one of the phone calls, Mr. Rodriguez, that we 23 would more likely than not be asserting the Fifth 24 Amendment today as a consequence of not being able 25 to reach any arrangement as I had proposed.</p>

<p style="text-align: right;">17</p> <p>1 The case law that I looked at very</p> <p>2 briefly, Supreme Court cases, a couple of them, make</p> <p>3 it pretty clear to me that if there is a reasonable</p> <p>4 fear of implication of -- of criminal nature that</p> <p>5 the client is well advised and well within their</p> <p>6 rights to assert the Fifth. It can't be a trifling</p> <p>7 fear, it can't be unrealistic, but it can certainly</p> <p>8 be a justification for asserting the Fifth.</p> <p>9 And I think in this case given what I</p> <p>10 know of the record so far -- and as both know, I'm</p> <p>11 fairly new to the case, still trying to get up to</p> <p>12 speed. But when I look at your subpoena, for one,</p> <p>13 in the use sections it spells out how you intend to</p> <p>14 use these depositions. And there is some phrasing</p> <p>15 in there which essentially, as I read it, says "or</p> <p>16 anything else we want to use it for," "or any other</p> <p>17 purpose" I think was your phrasing.</p> <p>18 Okay. So, I have some questions for you</p> <p>19 folks in that regard.</p> <p>20 I am concerned that given what I see on</p> <p>21 your website and given the history of how the FTC</p> <p>22 has pursued civil matters and then, as reflected in</p> <p>23 your website in many of the cases you've handled</p> <p>24 they get flipped over at some point in time, and I</p> <p>25 don't know when, but they get flipped over for</p>	<p style="text-align: right;">19</p> <p>1 from time to time we share information with</p> <p>2 Government agencies, and that those communications</p> <p>3 with Government agencies may be civil or criminal</p> <p>4 and are confidential, and we can't disclose them.</p> <p>5 MR. WHITE: I'll accept that answer for</p> <p>6 now.</p> <p>7 And it tells me what I needed to know.</p> <p>8 And that is, in essence, there is quite often a</p> <p>9 pattern or practice where the FTC civil flips</p> <p>10 information to criminal. And that adds to my</p> <p>11 attorney.</p> <p>12 The other question I have, and I'll --</p> <p>13 I'll get to the end of this so you can go on --</p> <p>14 MR. RODRIGUEZ: Okay.</p> <p>15 MR. WHITE: -- soon. I didn't mean to</p> <p>16 take this much time, but I appreciate your</p> <p>17 indulgence.</p> <p>18 Is the video live feed elsewhere? Is</p> <p>19 someone else watching us?</p> <p>20 MR. RODRIGUEZ: No.</p> <p>21 MR. WHITE: Okay.</p> <p>22 MR. RODRIGUEZ: There is -- our</p> <p>23 investigator Connor Sands is on the phone.</p> <p>24 MR. WHITE: You didn't announce him.</p> <p>25 MR. RODRIGUEZ: I'm so sorry about that.</p>
<p style="text-align: right;">18</p> <p>1 potential criminal prosecution.</p> <p>2 So, what I would like to know from you</p> <p>3 is if anyone on your team, your attorneys,</p> <p>4 paralegals, staff, supervisors, subordinates or</p> <p>5 investors has been in communication with anyone with</p> <p>6 any prosecutorial authority regarding this case.</p> <p>7 That's a question for you.</p> <p>8 I sense from our past history that I</p> <p>9 probably won't get an answer, but I'd like one.</p> <p>10 If -- if there has been that sort of</p> <p>11 communication, I think in fairness I ought to know.</p> <p>12 So that's my first question for you, either one of</p> <p>13 you.</p> <p>14 MR. RODRIGUEZ: Well, you know, I think</p> <p>15 it's our position here that I'm not here to testify.</p> <p>16 Neither are you.</p> <p>17 MR. WHITE: I'm not asking you to answer</p> <p>18 it under oath. I'm just asking you --</p> <p>19 MR. RODRIGUEZ: Right.</p> <p>20 MR. WHITE: -- as a colleague to answer</p> <p>21 my question honestly and forthrightly.</p> <p>22 MR. RODRIGUEZ: What I can say, and what</p> <p>23 I can say is limited because by the nature of, you</p> <p>24 know, the ethical and -- my ethical duties as an</p> <p>25 employee of the Federal Trade Commission, is that</p>	<p style="text-align: right;">20</p> <p>1 He is listening in, Connor Sands.</p> <p>2 MR. WHITE: Well, let's get his record,</p> <p>3 please.</p> <p>4 MR. RODRIGUEZ: Okay. Can you please</p> <p>5 note that Mr. Connor Sands, an invest- -- an FTC</p> <p>6 investigator is on the phone.</p> <p>7 MR. WHITE: Mr. Sands, can you hear us?</p> <p>8 MR. SANDS: I can.</p> <p>9 MR. WHITE: Thank you.</p> <p>10 All right. This case came to my</p> <p>11 attention only a few weeks ago. And it came to my</p> <p>12 attention in part as a result of a conversation that</p> <p>13 I had had with Bob Shapiro. And it was my</p> <p>14 understanding at that point in time when I was asked</p> <p>15 to consider taking on this case that the case was</p> <p>16 virtually on the verge of settlement.</p> <p>17 I since had that erroneous understanding</p> <p>18 corrected by Ms. Sanger, who says no, we have not</p> <p>19 had any substantive discussions on settlement.</p> <p>20 Nonetheless, from your website, I see</p> <p>21 pretty clearly that the vast majority of the cases</p> <p>22 that your division handles end up in a settlement.</p> <p>23 And we certainly seek to advance that possibility.</p> <p>24 I know from our many conversations that</p> <p>25 you are concerned about following the bread crumb</p>

<p style="text-align: right;">21</p> <p>1 trails to whatever assets may be out there. 2 So I'd like to talk about a carve-out 3 possibility for today so that we can be somewhat 4 productive, although we will be asserting the Fifth, 5 as I say, to probably the vast majority of the 6 questions asked. 7 MR. RODRIGUEZ: I think that I should 8 cut you off at least because we can't agree to a 9 carve-out. 10 I have a series of questions that I'm 11 going to pose. And if Miss Cardiff chooses to 12 assert the Fifth, she is free to do so, and we'll 13 just take it question by question. 14 MR. WHITE: All right. There is another 15 housekeeping matter that I'd like to discuss at some 16 point, and that is the deposition of Gerald Cardiff 17 that you've noticed. I'd like to exchange from 18 information with you in that regard. 19 We don't have to do it on the record nor 20 do we have to do it right now. 21 MR. RODRIGUEZ: Thank you. 22 MR. WHITE: But it's on my agenda. 23 MR. RODRIGUEZ: Okay. We can do that 24 after the deposition. 25 MR. WHITE: All right. So, having been</p>	<p style="text-align: right;">23</p> <p>1 of you expressing a Fifth Amendment privilege, if 2 only the witness could do it. 3 MR. WHITE: Well, I'm looking for a way 4 to expedite, as well. I'm happy to address that. 5 In your admonitions you made it clear 6 that if she was in the middle of answering a 7 question, she could not then ask for a break. 8 So, I don't want her to start an answer 9 that she under your admonitions will then have to 10 finish the answer before being able to consult with 11 me. 12 So, while I accept your concern about 13 being efficient, my reason for interposing my 14 comment first was to make sure that the witness 15 didn't start to answer prematurely. And thus, as 16 you noticed, and I suspect it's on camera, I did 17 indeed put my hand up in front of her as a caution, 18 do not answer until I speak. 19 So, if with your permission what I would 20 do then basically as I see your line of questioning 21 and your multi-page outline in front of you -- can 22 we take a shot at that? That's beautiful. 23 I'm teasing. 24 I want to find a way to expedite it. 25 So, I'm going to sit silent until I decide not to be</p>
<p style="text-align: right;">22</p> <p>1 duly cut off, I'll cede the floor. 2 MR. RODRIGUEZ: Thank you. 3 BY MR. RODRIGUEZ: 4 Q. Miss Cardiff, are you currently 5 employed? 6 MR. WHITE: We'll assert the Fifth. 7 Do you mind if I simply make the 8 assertion, or do you actually want to hear it from 9 her. 10 MR. RODRIGUEZ: I'd like to hear it from 11 the witness. 12 MR. WHITE: Very well. 13 THE WITNESS: Under the advice of 14 counsel, I'm asserting my Fifth Amendment privilege. 15 BY MR. RODRIGUEZ: 16 Q. Okay. Have you taken any steps to find 17 work after your -- after the defendants were shut 18 down in October of 2018? 19 MR. WHITE: We'll a certain the Fifth. 20 THE WITNESS: I'm asserting my Fifth 21 Amendment privilege. 22 BY MR. RODRIGUEZ: 23 Q. I think that it might be easier -- and I 24 hope we can reach an agreement -- that instead of 25 both of you saying that -- you know, instead of both</p>	<p style="text-align: right;">24</p> <p>1 silent, and that could happen at any time. Okay? 2 But I will rely on the witness to assert 3 the Fifth without any other response. 4 MR. RODRIGUEZ: Okay. 5 MR. WHITE: And if the witness doesn't 6 do that, then I will reserve the right to interpose 7 on her behalf. 8 Is that fair enough? 9 MR. RODRIGUEZ: Yes. 10 MR. WHITE: Any questions about that? 11 THE WITNESS: (No audible response.) 12 MR. WHITE: We'll be efficient that way. 13 MS. SANGER: Thank you. 14 MR. RODRIGUEZ: Thank you. 15 BY MR. RODRIGUEZ: 16 Q. Do you currently have any job? 17 A. I'm asserting my Fifth Amendment 18 privilege? 19 Q. In addition to your name of Eunjung 20 Cardiff, have you ever used any other names? 21 A. I'm asserting my Fifth Amendment 22 privilege. 23 Q. Have you ever gone by the name Eunjung 24 know? 25 A. I'm asserting my Fifth Amendment</p>

25

1 privilege.

2 **Q. I also want to advise you, you could**
3 **also say "I plead the Fifth" or "the Fifth" just to**
4 **make it easier for you.**

5 MR. WHITE: I think we'll stay with the
6 pattern --

7 MR. RODRIGUEZ: Okay.

8 MR. WHITE: -- that we've developed.
9 Thank you.

10 BY MR. RODRIGUEZ:

11 **Q. What is the highest salary that you have**
12 **ever earned at any job you have held?**

13 A. I am asserting my Fifth Amendment
14 privilege.

15 **Q. Isn't it true that you were the**
16 **marketing director for Cannella Response Television?**

17 A. I am asserting my Fifth Amendment
18 privilege.

19 **Q. Isn't it true that you have a degree**
20 **from Columbia University?**

21 A. I am asserting my Fifth Amendment
22 privilege.

23 **Q. Isn't it true that you were the**
24 **president of People United for Christians located in**
25 **Upland, California?**

26

1 A. I am asserting my Fifth Amendment
2 privilege.

3 **Q. Is People United for Christians -- and**
4 **henceforth I will refer to that entity as PUFC.**
5 **Is it currently active?**

6 A. I am asserting my Fifth Amendment
7 privilege.

8 **Q. Is PUFC still soliciting donations from**
9 **the public?**

10 A. I am asserting my Fifth Amendment
11 privilege.

12 **Q. Is PUFC still soliciting donations from**
13 **the public in the United States.**

14 A. I am asserting my Fifth Amendment
15 privilege.

16 **Q. Is PUFC currently soliciting donations**
17 **from the public in Canada?**

18 A. I am asserting my Fifth amendment
19 privilege.

20 **Q. Have you ever been involved in the**
21 **operation of Messengers For Christ World Healing?**

22 A. I am asserting my Fifth Amendment
23 privilege.

24 **Q. Is Messengers For Christ World Healing**
25 **currently soliciting donations from the public?**

27

1 A. I am asserting my Fifth Amendment
2 privilege.

3 **Q. Isn't it true that you have identified**
4 **yourself as the president of PUFC?**

5 MR. WHITE: Objection. Vague
6 "identify."

7 BY MR. RODRIGUEZ:

8 **Q. Are you asserting your Fifth Amendment**
9 **privilege?**

10 MR. WHITE: An objection is on the
11 record.

12 Do you wish to clarify?

13 MR. RODRIGUEZ: Not at this time.

14 MR. WHITE: Fine. Privilege.

15 THE WITNESS: I am asserting my Fifth
16 Amendment privilege.

17 BY MR. RODRIGUEZ:

18 **Q. Isn't it true that PUFC in addition to**
19 **an address in Upland, California had an address at**
20 **1383 West Eighth Avenue in Vancouver, British**
21 **Columbia, Canada?**

22 MR. WHITE: Objection. Vague as to
23 time.

24 Privilege.

25 THE WITNESS: I am asserting my Fifth

28

1 Amendment privilege.

2 BY MR. RODRIGUEZ:

3 **Q. Did PUFC ever have an office at 701 West**
4 **Georgia Street, Suite 1500 in Vancouver, British**
5 **Columbia, Canada?**

6 A. I am asserting my Fifth Amendment
7 privilege.

8 **Q. Are you currently receiving any income**
9 **from Run Away?**

10 A. I am asserting my Fifth Amendment
11 privilege.

12 **Q. Are you currently receiving any income**
13 **from Advanced Men's Institute?**

14 A. I am asserting my Fifth Amendment
15 privilege.

16 **Q. Are you currently receiving any income**
17 **from any of the three Redwood Scientific corporate**
18 **defendants?**

19 A. I am asserting my Fifth Amendment
20 privilege.

21 **Q. Are you currently receiving any income**
22 **from Defendant Identify?**

23 A. I am asserting my Fifth Amendment
24 privilege.

25 **Q. Are you currently receiving any income**

29

1 from defendant Carols Place?

2 A. I am asserting my Fifth Amendment
3 privilege.

4 **Q. Miss Cardiff, I am presenting to you
5 what has been marked as Plaintiff's Exhibit 1.**

6 MR. RODRIGUEZ: Actually, could I have
7 that document back. I want to put a prefix on it.

8 MR. WHITE: And the prefix is?

9 MR. RODRIGUEZ: E, period, Cardiff 1.

10 (Whereupon the document referred

11 to was marked E. Cardiff Exhibit 1

12 by the Certified Shorthand

13 Reporter and is attached hereto.)

14 BY MR. RODRIGUEZ:

15 **Q. Ms. Cardiff, if you look through this
16 document --**

17 MR. RODRIGUEZ: Yes?

18 MR. WHITE: We're reviewing, Counsel.
19 Thank you.

20 BY MR. RODRIGUEZ:

21 **Q. Okay. Miss Cardiff, would you please
22 review the document.**

23 **Are you -- have you reviewed the
24 document, Miss Cardiff?**

25 MR. WHITE: I will acknowledge that she

30

1 and I have had time to review the document.

2 Ask your next question.

3 BY MR. RODRIGUEZ:

4 **Q. Isn't it true that in this document
5 on -- dated August 21, 2018, you identified yourself
6 as the president of PUFC in Upland, California?**

7 MR. WHITE: Objection. Document speaks
8 for itself.

9 Assert the privilege.

10 THE WITNESS: I am asserting my Fifth
11 Amendment privilege.

12 BY MR. RODRIGUEZ:

13 **Q. Based on this document, do you recall
14 now whether you were, in fact, the president of PUFC
15 at this time?**

16 A. I am asserting my Fifth Amendment
17 privilege.

18 **Q. If you look at the third page of the
19 document, do you see where it says "Primary Email
20 Address"?**

21 MR. WHITE: Privilege.

22 THE WITNESS: I am asserting my Fifth
23 Amendment privilege.

24 BY MR. RODRIGUEZ:

25 **Q. Have you ever used the email address**

31

1 **Eunjung@officemgt.com?**

2 A. I am asserting my Fifth Amendment
3 privilege.

4 **Q. Is the signature on page three your
5 signature?**

6 A. I am asserting my Fifth Amendment
7 privilege.

8 (Whereupon the document referred

9 to was marked E. Cardiff Exhibit 2

10 by the Certified Shorthand

11 Reporter and is attached hereto.)

12 BY MR. RODRIGUEZ:

13 **Q. Miss Cardiff, I am presenting to you
14 what has been marked as E. Cardiff Exhibit 2.**

15 MR. WHITE: Thank you. Thank you,
16 Counsel.

17 BY MR. RODRIGUEZ:

18 **Q. Please let me know when you've had an
19 opportunity to review the document.**

20 MR. WHITE: Thank you, Counsel. I'll
21 let you know.

22 We've had time to review the document.

23 Thank you.

24 BY MR. RODRIGUEZ:

25 **Q. Miss Cardiff, does this document refresh**

32

1 **your recollection of whether PUFC had an office at
2 1383 West Eighth Avenue in Vancouver, British
3 Columbia, Canada?**

4 A. I am asserting my Fifth Amendment
5 privilege.

6 **Q. Did PUFC have an account, a bank
7 account, at TD Canada Trust?**

8 A. I am asserting my Fifth Amendment
9 privilege.

10 **Q. Does PUFC currently have any assets in
11 and in Canada?**

12 A. I am asserting my Fifth Amendment
13 privilege.

14 **Q. Were there any other entities under your
15 operation and -- or control located at that same
16 address?**

17 A. I am asserting my Fifth Amendment
18 privilege.

19 **Q. Were there any entities in the past or
20 currently under your operation or control that are
21 or were located at 700 West Georgia Street,
22 Vancouver, British Columbia in Canada?**

23 A. I am asserting my Fifth Amendment
24 privilege.

25 (Whereupon the document referred